

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and)	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated,)	
Plaintiff,)	Honorable Aleta A. Trauger
vs.)	[PROPOSED] REVISED CASE
CORRECTIONS CORPORATION OF)	MANAGEMENT ORDER
AMERICA, et al.,)	
Defendants.)	
_____)	

Lead Plaintiff and Class Representative Amalgamated Bank, as Trustee for the LongView Collective Investment Fund (“Plaintiff”), and Defendants CoreCivic, Inc., formerly known as Corrections Corporation of America (“CoreCivic” or the “Company”), Damon T. Hininger, David M. Garfinkle, Todd J. Mullenger and Harley G. Lappin (collectively, “Defendants”) (together, the “Parties”), submit the following [Proposed] Revised Case Management Order.

WHEREAS, the July 9, 2020 Revised Case Management Order (ECF No. 238) set October 16, 2020 as the deadline for completion of expert depositions;

WHEREAS, the July 29, 2020 Revised Case Management Order (ECF No. 258) indicated that there was “[n]o change” to the October 16, 2020 deadline for completion of expert depositions (*id.*); however, in their proposed order, the Parties mistakenly included the date of October 2, 2020;

WHEREAS, the Parties agree that a short extension to the deadline for completion of expert depositions, and no other deadlines, will assist in accommodating the experts’ schedules, allow the Parties to efficiently complete their depositions and cause no prejudice; and

WHEREAS, the Parties reserve the right to seek additional modifications of the case schedule if such modifications become necessary;

NOW, THEREFORE, subject to approval of the Court, the Parties agree on the following deadlines to govern the remainder of the case:

Matter	Existing Date	New Date
Completion of Expert Depositions	October 16, 2020	October 30, 2020
Dispositive & <i>Daubert</i> Motions		
• Opening Briefs	November 13, 2021	<i>No change</i>
• Oppositions	January 15, 2021	<i>No change</i>
• Replies	February 19, 2021	<i>No change</i>
Information Exchange	April 13, 2021	<i>No change</i>
Motions <i>in Limine</i>	April 16, 2021	<i>No change</i>
Motion <i>in Limine</i> Responses	April 27, 2021	<i>No change</i>
Pretrial Filings	April 27, 2021	<i>No change</i>
Pretrial Order	April 27, 2021	<i>No change</i>
Pretrial Conference	April 30, 2021	<i>No change</i>
Trial	May 18, 2021	<i>No change</i>

IT IS SO ORDERED.

DATED: _____

THE HONORABLE ALETA A. TRAUGER
UNITED STATES DISTRICT JUDGE

Submitted by:

DATED: September 29, 2020

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on September 29, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

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